

### **Remarks**

Applicant respectfully requests reconsideration of this application as amended.

Claims 1, 5, 10, 14, 18 and 22 have been amended. No claims have been cancelled.

Therefore, claims 1-26 are presented for examination.

In the Office Action, claims 5-9 and 14-17 stand rejected under 35 U.S.C. §112, second paragraph. Claims 5 and 14 have been amended to appear in proper condition for allowance.

Claims 1-2, 4-5, 10-12, 14-15, 17-19 and 21 stand rejected under 35 U.S.C. §102(b) as being anticipated by Parker (U.S. Patent No. 6,535,949). Applicant submits that the present claims are patentable over Parker.

Parker discloses a portable electronic device that includes a log-structured file system implemented in flash memory. The log-structured file system includes a write function for storing contiguous data records to the flash memory. See Parker at Abstract. The flash memory and the log-structured file system stores a plurality of logs of contiguous data records in the flash memory, and reads data from the flash memory using a plurality of memory mapped pointers that point to the individual data records. See Parker at col. 2, ll. 32-36. Parker further discloses that the plurality of memory mapped pointers may be stored in a RAM associated with the portable electronic device. See Parker at col. 3, ll. 18-21.

Claim 1 of the present application recites reclaiming space in a flash memory to accommodate a request. Parker does not disclose or suggest such a feature. Parker discloses a log-structured file system that includes a write function for storing contiguous data records to a flash memory. However, nowhere in Parker is there disclosed or suggested reclaiming

space in a flash memory to accommodate a request. Therefore, claim 1 is patentable over Parker.

Claims 2-4 depend from claim 1 and include additional features. Thus, claims 2-4 are also patentable over Parker.

Claim 5 recites reclaiming space in a flash memory to accommodate a request. Accordingly, for the reasons described above with respect to claim 1, claim 5 is patentable over Parker. Because claims 6-9 depend from claim 5 and include additional features, claims 6-9 are also patentable over Parker.

Claim 10 recites reclaiming space in a flash memory to accommodate a request. Accordingly, for the reasons described above with respect to claim 1, claim 10 is patentable over Parker. Because claims 11-13 depend from claim 10 and include additional features, claims 10-13 are also patentable over Parker.

Claim 14 recites reclaiming space in a flash memory to accommodate a request. Accordingly, for the reasons described above with respect to claim 1, claim 14 is patentable over Parker. Because claims 15-17 depend from claim 14 and include additional features, claims 15-17 are also patentable over Parker.

Claim 18 recites reclaiming space in a flash memory to accommodate a request. Accordingly, for the reasons described above with respect to claim 1, claim 18 is patentable over Parker. Because claims 19-21 depend from claim 18 and include additional features, claims 19-21 are also patentable over Parker.

Claims 3, 6-8, 13, 16, 20 and 22-25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Parker (U.S. Patent No. 6,535,949) in view of Lloyd-Jones (EP 0489204). Applicant submits that the present claims are patentable over Parker in view of Lloyd-Jones.

Lloyd-Jones discloses a reprogrammable data storage device which includes a host I/O port, a media read/write drive, a data buffer for buffering data flow between the I/O port and the drive, and control and processing electronics. See Lloyd-Jones at Abstract.

However, Lloyd-Jones does not disclose or suggest reclaiming space in a flash memory to accommodate a request, as recited by claim 22. As discussed above, Parker does not disclose or suggest such a feature. Since neither Parker nor Lloyd-Jones disclose or suggest reclaiming space in a flash memory to accommodate a request, any combination of Parker and Lloyd-Jones would not disclose or suggest the feature. Therefore, claim 22 is patentable over Parker in view of Lloyd-Jones.

Claims 23-26 depend from claim 22 and include additional features. Thus, claims 23-26 are also patentable over Parker in view of Lloyd-Jones.

Claims 9 and 26 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Parker in view of Lloyd-Jones, and further in view of Watanabe et al. (U.S. Patent No. 5,590,306). Applicant submits that the present claims are patentable over Parker in view of Lloyd-Jones in further view of Watanabe.

Watanabe discloses an IC memory card control system including an IC memory card and an IC memory card control apparatus. The IC memory card is detachably mounted to store therein management information as well as data. The management area of the IC memory card is provided with an identification area into which are written an occupation code indicative of recording of the data in the data area and a recording code indicative of an abnormal recording of the data in the data area. See Watanabe at Abstract. However, Watanabe does not disclose or suggest reclaiming space in a flash memory to accommodate a request.

As discussed above, neither Parker nor Lloyd-Jones disclose or suggest such a feature. Since Parker, Lloyd-Jones or Watanabe do not disclose or suggest reclaiming space in a flash memory to accommodate a request, any combination of Parker, Lloyd-Jones and Watanabe would not disclose or suggest the feature. Therefore, the present claims are patentable over Parker in view of Lloyd-Jones in further view of Watanabe.

Applicant respectfully submits that the rejections have been overcome and that the claims are in condition for allowance. Accordingly, applicant respectfully requests the rejections be withdrawn and the claims be allowed.


The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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